

GRACE L. SANDOVAL

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SAN DIEGO CA 92171 FILED

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CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

GRACE L. SANDOVAL

CASE NO.
08 CV 1623 BEN JMA

Plaintiff,

vs.

COUNTY OF SAN DIEGO

Defendant.

RICO CASE STATEMENT

1. State whether the alleged unlawful conduct is in violation of 18 U.S.C. 1962(a), (b), (c),
and/or (d). YES

2. List the defendants and state the alleged misconduct and basis of liability of each
defendant. FATIMA SCALI ARREDONDO IRMA R. CLARK,

FED MENA N. OUTRA, KIDNAPED MY DAUGHTERS
3. List alleged wrongdoers, other than the defendants listed above, and state the alleged CORINA
misconduct of each wrongdoer. FORCED ILLEGAL DRUGS RAPED AND PRISCELLA
BY BROWN ADDICTS, CAUSED EYE

4. List the alleged victims and state how each victim was allegedly injured.

5. Describe in detail the pattern of racketeering activities or collection of unlawful debts BORN
alleged for each RICO claim. The description of the pattern of racketeering shall include the PREMAT
following information: RUNNING OVER DAUGHTERS PRISCELLA TURE

a. List the alleged predicate acts and the specific statutes that were allegedly violated;

TAKING HUMAN BLOOD ILLEGALLY
TAKING FLUID FROM BRAIN & BODY, LIVER
ETC.

1 the enterprise, if at all.

2 9. Describe what benefits, if any, the alleged enterprise receives from the alleged pattern of
3 racketeering. *NO FOOD, NO VITAMINS, NO HEALTH
PNS, COVERAGE*

4 10. Describe the effect of the activities of the enterprise on interstate or foreign commerce.

5 11. If the complaint alleges a violation of 18 U.S.C. 1962(a), provide the following: (a) state
6 *KIDNAP, RAPED HOSTAGE*
who received the income derived from the pattern of racketeering activity or through the collection of
7 *IRMIA R. CLARK, LUPE N. PINA WELFARE*
unlawful debt; and (b) describe the use or investment of such income.

8 12. If the complaint alleges a violation of 18 U.S.C. 1962(b), describe in detail the acquisition
9 *KIDNAP, RAPED HOSTAGE, INJURIES*
of maintenance of any interest in or control of the alleged enterprise.

10 13. If the complaint alleges a violation of 18 U.S.C. 1962(c), provide the following: (a) state
11 *LAURIE HARRISON, JOE CRUZ*
12 who is employed by or associated with the alleged enterprise, and (b) state whether the same entity is
13 *MANUEL GARCIA, ERNESTO NUNGARAY,*
both the liable "person" and the "enterprise" under 18 U.S.C. 1962(c).

14 14. If the complaint alleges a violation of 18 U.S.C. 1962(d), describe in detail the facts
15 *KATHRYN D'AVENDITI AKA: KATE, LEONARD*
16 showing the existence of the alleged conspiracy.

17 15. Describe the alleged injury to business or property. *CASTILLO, SUSAN*
18 *FINK, BAP RUSSO AKA: BAPSI SLALI, PRISCILLA*
19 *SCHOOL*

20 16. Describe the direct/casual relationship between the alleged injury and the violation of the
21 *HOSTAGE, RAPE, KIDNAPED, INJURY,*
22 *FORCED TO CARRY PREMATURE EACH YEAR, ETC.*

23 17. List the damages sustained by reason of the violation of 18 U.S.C. 1962, indicating the
24 *FIFTEEN CHILDREN BORN PREMATURE*
25 amount for which each defendant is allegedly liable. *EACH YEAR FROM EACH*

26 18. List all other federal causes of action, if any, and provide the relevant statute numbers.

27 19. List all pendent state claims, if any.

28 20. Provide any additional information that you feel would be helpful to the court in
processing your RICO claims. *JOE S. REYNA, JAVIER S. REYNA*

DATED:

SEPTEMBER 4, 2008

*TO MAKE
huge GROWTH*

Grace L. Sandoval

27 Attorney for Plaintiff(s)

28